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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et. al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, *et. al.*,

Defendants.

Case No. 3:25-cv-05687-TLT

**UNOPPOSED REQUEST FOR REMOTE  
APPEARANCE**

Judge: Hon. Trina L. Thompson

Defendants respectfully request this Court to permit remote appearance of defense counsel at the hearing on Plaintiffs' Motion for Class Certification, scheduled for September 16, 2025, at 11:00 a.m. PDT. ECF No. 98. While Defendants will be providing a written response to the Court's questions, and believe the matter may be resolved on the written filings, counsel for Defendants, Daniel Cappelletti and William Weiland, have made arrangements to appear in person. However, travel to San Francisco from Washington, D.C. will entail what adds up to three days out of the office, which complicates their ability to respond to other deadlines during this timeframe. Additionally, a technology conference in the city during these same travel dates has pushed lodging costs for hotels near the courthouse well beyond what is authorized for government travel. As a result, defense counsel have had to make reservations at lodging that is a substantial distance from the courthouse, further complicating their travel.

Plaintiffs' counsel have been consulted and have stated that while they intend to be present in person, they do not object to Defendants' request for an accommodation to appear remotely. Defense counsel acknowledge the short-fused nature of this request given their impending travel and appreciate the Court's indulgence.

Dated: September 12, 2025

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Respectfully submitted,

/s/ Daniel M. Cappelletti

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